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5	E: gabriel@grassodefense.com Attorney for ELKIND		
6	UNITED STATES DISTRICT COURT		
7	DISTRICT OF NEVADA		
8	DIOTAL	OT OF NEVADA	
9	UNITED STATES OF AMERICA,)	
10	Plaintiff,))	
11	VS.) Case No.: 2:20-mj-00709-BNW-1	
12		STIPULATION TO CONTINUE	
13	SHEENA ELKIND,) PRELIMINARY EXAMINATION DATE)	
14	Defendant.	(ELEVENTH REQUEST)	
15		<u>)</u>	
16	IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,		
17	Acting United States Attorney, District of Nevada, and Edward G. Veronda, Assistant		
18			
19	United States Attorney, counsel for the United States of America, and Gabriel L. Grasso,		
20	Esq, counsel for SHEENA ELKIND, that the Preliminary Examination hearing currently		
21	scheduled for January 27, 2021 at 10:00 a.m., be vacated and set to a date and time		
22	convenient to this court but no sooner than ninety (90) days.		
23	The Stipulation is entered into for the following reasons:		
24	 Following continued investigation by both parties to this matter, plea negotiations 		
25	are continuing and will require the additional requested time to resolve.		
26	are community and this require	and desired requestion time to receiver	

2. Ms. ELKIND is on Pretrial Release and does not object to the continuance.

3. The parties agree to the continuance.

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- 4. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to be able to effectively and complete investigation of the discovery materials provided.
- 5. Denial of this request for continuance would result in a miscarriage of justice.
- 6. The additional time requested by this Stipulation is excusable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code, Section 3161(h)(7)(B)(i), (iv).
- 7. This is the eleventh request for a continuance of the preliminary hearing date in this case.

DATED this 19th day of January 2022.

GABRIEL L. GRASSO, P.C. Counsel for SHEENA ELKIND	CHRISTOPHER CHIOU Acting United States Attorney
By <u>/s/ Gabriel L. Grasso</u>	By <u>/s/ Edward G. Veronda</u>
GABRIEL L. GRASSO, ESQ.	Assistant United States Attorney

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7	UNITED STATES DISTRICT COURT		
	DISTRICT OF NEVADA		
8	UNITED STATES OF AMERICA,)		
9	Plaintiff,) \	
10	Flailluit,) Case No.: 2:20-mj-00709-BNW-1	
11	VS.))	
12	SHEENA ELKIND,	OF LAW AND ORDER	
13))	
14	Defendant.))	
15	FINDINGS OF FACT		
16			
17	Based on the pending Stipulation of counsel, and good cause appearing therefore,		
18	the Court finds that:		
19	Plea negotiations are continuin	g and will require the additional requested time to	
20	resolve		
21	2. Ms. ELKIND is on Pretrial Rele	ease and does not object to the continuance.	
22	The parties agree to the contin	uance.	
23	4. The additional time requested	herein is not sought for purposes of delay, but	
24	merely to allow counsel for defendant sufficient time within which to be able to		
25	effectively and complete invest	igation of the discovery materials provided.	
2627	Denial of this request for contir	nuance would result in a miscarriage of justice.	

- 6. The additional time requested by this Stipulation is excusable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code, Section 3161(h)(7)(B)(i), (iv).
- 7. This is the eleventh request for a continuance of the preliminary hearing date in this case.

CONCLUSIONS OF LAW

The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy trial, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for trial, taking into account the exercise of due diligence.

The continuance sought herein is excusable under the Speedy Trial Act, Title 18, United States Code, Section § 3161 (h)(7)(A), when the considering the factors under Title 18, United States Code, § 3161(h)(7)(B)(i), (iv).

<u>ORDER</u>

IT IS THEREFORE ORDERED that the Preliminary Examination hearing currently scheduled for January 27, 2022 at 1:00 p.m. be vacated and continued to April 28, 2022 at 10:00 a.m.

DATED this 21st day of ______, 2022.

Brand States Magistrate Judge

United States Magistrate Judge